

**FY 2015 FLEET MANAGEMENT PLAN AND BUDGET NARRATIVE
AND VEHICLE ALLOCATION METHODOLOGY REPORT (VAM)
FOR
Department of Labor**

(A) Introduction that describes the agency mission, organization, and overview of the role of the fleet in serving agency missions.

(1) Briefly describe your agency's primary/core mission and how your fleet is configured to support it.

(2) Please describe the organizational structure and geographic dispersion of your fleet.

(3) Describe your agency's ancillary missions, such as administrative functions, and how your fleet supports them.

(4) Describe how vehicles are primarily used, and how do mission requirements translate into the need for particular vehicle quantities and types.

The Department of Labor (DOL) fosters and promotes the welfare of the job seekers, wage earners, and retirees of the United States by improving their working conditions, advancing their opportunities for profitable employment, and protecting their retirement, health care, and other benefits. Toward this end, DOL administers and enforces more than 180 federal laws and numerous regulations that cover the workplace for some 10 million employers and 125 million workers. These DOL programs are not involved significantly in substantial greenhouse gas (GHG) emitting production processes. However, to fulfill its mission, DOL maintains a fleet of about 4,000 vehicles, the majority of which are used by DOL worker enforcement agencies nationwide, and nearly all of the remaining vehicles serve participants on 126 Job Corps Center campuses across the U.S.

DOL advances its overall mission through the work of many agencies. Agency mission requirements are paramount when analyzing fleet optimization actions. Agency mission needs can limit fleet reduction possibilities or dictate vehicle requirements. For example, DOL worker enforcement agencies require vehicles to conduct compliance and enforcement inspections. The need to transport or install specialized equipment in enforcement vehicles, or to deal with variable road terrain conditions, often defines what vehicle models an agency can consider. Therefore, all DOL agencies and the Departmental Fleet Manager carefully analyze fleet optimization strategies and options to ensure that vehicle reduction, model downsizing, and conversions from conventional to alternative fuels do not compromise the agency mission.

DOL's Mine Safety and Health Administration (MSHA) provides a clear example of mission-driven fleet optimization. MSHA administers the Federal Mine Safety and Health Act of 1977 to enforce compliance with mandatory safety and health standards in the nation's mines. MSHA's mission is to prevent death, disease, and injury in mining and promote safe and healthful workplaces for the Nation's miners. Statutorily, MSHA is required to conduct complete inspections of all underground mines four times per year, and all active surface mines twice per year. Consequently, each day mining inspectors travel many miles to inspect our nation's metal and non-metal mines to safeguard worker health and safety. Because mines may be many miles apart and inspection vehicles must carry specialized equipment, vehicles cannot be shared by inspectors. This work often requires vehicles that are "trail rated" to navigate the rugged terrain and harsh weather conditions that MSHA inspectors encounter. Because DOL leases GSA vehicles, inspector vehicle choices are limited to the vehicles available through GSA. Additionally, MSHA has specially equipped vehicles such as its large mobile Command Center used in mining emergencies. Therefore, fleet reduction may not be feasible for MSHA. Instead, the agency has looked to other options for optimizing their fleet and has already replaced many of its larger conventionally fueled vehicles with smaller low greenhouse gas vehicles and alternative fueled vehicles (AFV) including gas-electric hybrids, where practicable.

Whereas MSHA's mission fulfillment may require it to add or retain some conventionally-fueled specialty vehicle models, DOL's Occupational Safety and Health Administration (OSHA) and the Wage and Hour Division (WHD) have identified different fleet requirements for their inspectors. OSHA compliance officers conduct over 42,000 site inspections annually in order to secure safe and healthy workplaces, particularly in high-risk industries. The WHD enforces the minimum wage, overtime, and child labor provisions in America's 7.5 million workplaces. Both these agencies have determined that their conventionally-fueled fleets can generally be converted to AFVs without

compromising mission requirements. Additionally, the smallest size vehicle that can provide adequate cargo space for transporting luggage, specialized inspection equipment and confiscated evidence is selected.

At DOL's 126 Job Corps sites, mission-driven fleet optimization is also evident. Job Corps delivers comprehensive job skills training and education to eligible youth, most of whom live, train, and study on residential campuses located in 48 states, Puerto Rico, and the District of Columbia. Most vehicles at Job Corps campuses are used for student transportation and for staff to conduct key functions of the program's mission. For example, vehicles transport students to work-based learning sites, community colleges, recreational activities, or public and private transportation (bus lines, airports), and are used to evacuate students during emergency events. The Job Corps fleet averages 1,720 GSA-leased vehicles system-wide (down from 1,850 in FY 2012) and includes light, medium, and heavy-duty vehicles, as well as buses and passenger vans. The remaining Job Corps vehicles are DOL-owned and most are used exclusively for on-site Job Corps operations. Job Corps' fleet optimization plan has included replacing its on-site vehicles with electric models. Thus, Job Corps currently uses about 200 low-speed, all-electric utility vehicles for maintenance, security, and other campus operations.

(B) Description of vehicle acquisition/replacement strategies.

(1) Describe your agency's vehicle sourcing strategy and decision(s) for purchasing/owning vehicles compared with leasing vehicles through GSA Fleet or commercially. When comparing the cost of owned vehicles to leased vehicles, you should compare all direct and indirect costs projected for the lifecycle of owned vehicles to the total lease costs over an identical lifecycle. Include a rationale for acquiring vehicles from other than the most cost effective source. Note: Information on calculating indirect cost is contained in FMR Bulletin B-38, Indirect Costs of Motor Vehicle Fleet Operations.

(2) Describe your agency's plans and schedules for locating AFVs in proximity to AFV fueling stations.

(3) Describe your agency's approach to areas where alternative fuels are not available and whether qualifying low greenhouse gas (LGHG) vehicles or ZEVs are being placed in such areas.

(4) EO 13693 requires agencies to reduce greenhouse gas (GHG) emissions as compared to a 2014 baseline. Describe your agency's plans to meet this goal. If funding is required to comply with this mandate, do you have documentation that it has been requested?

(5) EO 13693 requires agencies to acquire zero emission vehicles (ZEVs) as an increasing percentage of passenger vehicle acquisitions. Describe your agency's plans to meet this goal. If funding is required to comply with this mandate, do you have documentation that it has been requested?

DOL acquires its vehicles primarily by lease through GSA because it is the most cost-effective method of acquisition. DOL does own a few vehicles that are installed with special equipment that would be too expensive to reinstall on a leased vehicle. Therefore, these vehicles will be utilized for a longer period of time than is customary for GSA leased vehicles. Additionally, DOL owns some specialty emergency response vehicles that cannot be obtained through a GSA lease. DOL will continue to review its fleet to ensure that vehicles leased or purchased are acquired from the most cost-effective source.

In addition to its Vehicle Allocation Methodology (VAM) reporting, during each annual GSA acquisition cycle the DOL reviews each vehicle scheduled for replacement to determine if it is within 5 miles or 15 minutes of an AFV fueling station. If alternative fuel (AF) is available within 5 miles of the vehicle location, and an appropriate AFV is available in that class that is State compliant, then agencies are instructed to select the AFV. DOL requires that its agencies first determine if a vehicle needs to be retained or if a strategy such as short term rentals, car-share, optimizing the motor pool, public transit, etc., will suffice. If the vehicle does need to be retained to meet mission needs, agencies are required to select the smallest sized low greenhouse gas vehicle possible to meet mission requirements. If E-85 is not available within 5 miles or 15 minutes of the vehicle location, agencies are instructed to select the smallest low GHG gasoline vehicle possible that meets mission requirements or to select a different AFV (e.g., electric, electric hybrid, CNG vehicle, propane, etc.) that has higher incremental costs. To the maximum extent possible, AFVs that are not dependent on infrastructure, such as gas-electric hybrid vehicles and qualifying low greenhouse gas (LGHG) vehicles are being placed in areas where alternative fuels are not available.

DOL plans to meet the GHG emissions reduction goals of EO13693 by continuing existing plans to optimize vehicle acquisition and replacement. Because a component of optimizing vehicle acquisition is the zero emission vehicle (ZEV) requirement in EO13693, DOL plans to survey to identify locations that might be suitable for existing level 1 EV

charging and exploring locations where level 2 EV charging stations might be most beneficial and cost practicable. However, because DOL inspection agencies often travel long distances, sometimes in harsh weather conditions across rugged terrain, plug-in electric vehicles may not be able to fulfill DOL inspection agencies mission needs.

(C) Description of Telematics related acquisition strategies.

- (1) EO13693 requires agencies to incorporate telematics into the fleet. Describe your agency's plans to meet this goal.
- (2) If funding is required to comply with this mandate, do you have documentation that it has been requested? (Do not attach or provide funding documentation unless requested).

DOL plans to incorporate telematics into the fleet as required in EO13693. DOL has explored vendor options and anticipates using GSA's new Blanket Purchase Agreement for telematics acquisition. Additionally, DOL is identifying vehicles to prioritize for telematics installation.

(D) Description of efforts to control fleet size and cost.

- (1) *Provide an explanation for any measurable change in your agency's fleet size, composition, and/or cost or if you are not meeting optimal fleet goals (based on agency VAM study results).*
- (2) *Describe the factors that hinder attainment of your optimal fleet (e.g., budgetary, other resource issues, mission changes, etc.).*
- (3) *Discuss any trends toward larger, less fuel-efficient vehicles and the justifications for such moves.*
- (4) *Are you aware of and do you consider alternatives (short term rental, pooling, public transportation, etc.) to adding a vehicle to the agency's fleet?*
- (5) *Discuss the basis used for your future cost projections (published inflation estimates, historical trends, flat across-the-board percentage increases, mission changes, etc.)*

Because DOL has been optimizing its fleet since 2007, the fleet is already at its optimal size. However, in FY 2015, two new Job Corps sites were opened, which require the Department to add additional vehicles to its fleet. In addition, in 2016 MSHA is expected to add additional inspection personnel who will require vehicles. Therefore, although the Department has been aggressive in identifying underutilized vehicles for elimination, the net effect on fleet size and costs is expected to increase slightly in 2016. However, DOL reduces vehicle size whenever feasible and this trend is expected to continue at least until the 2016 GSA acquisition cycle, at which time almost all of DOL's FY 2012 vehicles will have been replaced during a GSA replacement cycle. DOL acquires its vehicles from the most cost-effective source, which currently is GSA. The Department projects future fleet costs based upon agency projected vehicle additions and historical actuals adjusted by flat across-the-board percentage increases.

VEHICLE ALLOCATION METHODOLOGY REPORT (VAM)

Strategic Plan to Optimize Fleet

In 2012, DOL completed its initial Vehicle Allocation Methodology "fleet optimization" review to identify agency vehicle reductions and replacements through 2015. DOL recently updated these projections through 2020. Additionally, each year, DOL agencies are asked to review their fleets at the vehicle level and update these projections, if applicable. The results of DOL's most recent VAM survey at the vehicle level have not yet been fully analyzed and may provide further insight into additional opportunities for fleet optimization. Evolving missions, vehicle funding shortfalls, and better automotive technology does make fleet optimization a continually-changing target. Thus, every possible cost and fuel-saving solution remains on the table for consideration whenever that solution could meet mission needs. Therefore, DOL Fleet Managers will continue to periodically reassess and update their projections in light of the Department's mission and goals for fleet optimization. Table I provides current projections for agency vehicle reduction.

Table I: Vehicle Reductions

Agency	Vehicle Baseline FY 2011	Vehicle Projections FY 2020	Projected Change from Baseline
JOB CORPS	2000	1636	-18.2%
MSHA	1458	1425	-2.3%
OSHA	307	318	3.6%
OIG	165	164	-0.61%
WHD	93	104	11.8%
BLS	79	69	-12.7%
OFCCP	60	15	-75.0%
OLMS	59	50	-15.2%
EBSA	27	25	-7.4%
OASAM DPO ¹	-	17	N/A
OASAM	8	8	0.0%
ETA	5	2	-60.0%
OSEC	4	3	-25.0%
SOL	4	4	0.0%
OWCP	1	1	0.0%
DOL Fleet Total	4270	4028	-5.67%

¹ OASAM DPO Agency grouping was formed in 2015 with vehicles from OSEC and OIG.

Because DOL has been right-sizing its fleet since 2007, vehicle reductions play a secondary role in fleet optimization. Since most DOL fleet vehicles are used for enforcement or on Job Corps campuses, reducing the DOL fleet size any further might compromise agency missions. Instead, the Department's emphasis is on downsizing to smaller vehicles and replacing the conventionally-fueled vehicles with lower emission, electric and alternative fuel vehicles. Therefore, Table II shows the projected replacement of conventional fuel vehicles with AFVs.

Table II: Conventional Fuel Vehicle Replacements

	Vehicle Baseline FY 2011	FY 2011 % Fleet AFV or Electric¹	Vehicle Projections FY 2020	Projected FY 2020 % Fleet AFV or Electric
DOL Fleet Total	4270	53%	4028	74%

¹ Many vehicles located in DOL Field Offices are not located or primarily operated within a Metropolitan Statistical Area (MSA)/Consolidated Metropolitan Statistical Area (CMSA). Such vehicles are exempt from EPA's 1992 requirements for the acquisition of alternative-fuel vehicles by Federal agencies. In FY 2011 approximately 41% of DOL vehicles met this exemption requirement.

(E) Description of Vehicle Assignments and Vehicle Sharing.

(1) Describe how vehicles are assigned at your agency (i.e., individuals, offices, job classifications, motor pools).

(2) Describe your agency's efforts to reduce vehicles assigned to a single person wherever possible.

(3) Describe pooling, car sharing, and shuttle bus consolidation initiatives as well as efforts to share vehicles internally or with other Federal activities.

(4) Describe how home-to-work (HTW) vehicles are justified, assigned, and reported, as well as what steps are taken by your agency to limit HTW use.

(5) Does your agency document/monitor the additional cost of HTW use of Federal vehicles? If so, please describe how.

DOL initiated a review of all agency owned and leased vehicles in 2007, "Right-sizing the Fleet", as part of the Department's OMB Transportation Scorecard. Since then, DOL has continuously reviewed its fleet to match DOL owned and leased vehicles to agency mission requirements. In the initial Vehicle Assessment Methodology in 2012, DOL reinforced to each agency that vehicle use and size should be determined by mission needs, not preferences. Beginning in FY 2013, for annual GSA fleet acquisitions the DOL agency fleet managers and the Departmental Fleet Manager annually review each vehicle scheduled for replacement, with a particular emphasis on actualizing sustainability requirements and achieving maximum cost-effectiveness for the Department's fleet acquisition budget. This detailed review of all new acquisitions included: identifying underutilized vehicles for potential elimination from the fleet; consideration of options such as car-sharing, short term rentals, or public transit; vehicle size reduction without compromising mission; switching to low greenhouse gas models when such models were available from GSA; and, when possible, limiting alternative fuel vehicles (E-85) to locations with alternative fueling stations. Agency mission needs dictate the vehicle assignment, which ranges from some vehicles assigned to individual inspectors for regulatory and compliance agencies to shared "motor-pool" vehicles assigned to offices.

Of the almost 3,900 GSA-leased vehicles in the FY 2015 DOL fleet, 2,029 of these — almost 52%— are used by the Department's seven worker protection and enforcement agencies: the Mine Safety and Health Administration (MSHA); Occupational Safety and Health Administration (OSHA); the Wage and Hour Division (WHD); Office of Federal Contract Compliance Programs (OFCCP); Office of Labor-Management Standards (OLMS); the Employee Benefits Security Administration (EBSA); and the Office of Workers' Compensation Programs (OWCP). Many of these agencies already carry multiple inspectors in a vehicle when traveling to inspection worksites. Table III shows the growth of DOL enforcement and compliance agency staff who require vehicles, and the staff to total vehicle ratio for historic and recent periods.

Table III: Department of Labor Enforcement Staff and Total Vehicles

AGENCY		2006	2007...	2010	2011	FY 2012	FY 2013	FY 2014	FY 2015
EBSA	Inspectors (I) ¹	490	491	554	526	615	587	590	597
	Vehicles (V)	15	17	27	27	35	34	27	27
	I/V	32.7	28.9	20.5	19.5	17.6	17.3	21.9	22.1
MSHA	Inspectors	1219	1409	1427	1418	1449	1396	1424	1421
	Vehicles	1179	1228	1440	1458	1488	1443	1403	1421
	I/V	1.1	1.2	0.99	0.97	0.97	0.97	1.0	1.0
OFCCP	Inspectors	437	439	586	565	581	540	488	462
	Vehicles	24	39	60	60	61	54	34	15
	I/V	18.2	11.3	9.8	9.4	9.5	10	14.4	30.8
OIG	Inspectors	279	285	285	289	287	278	265	255
	Vehicles	100	131	168	165	165	166	156	156
	I/V	2.8	2.2	1.7	1.8	1.7	1.7	1.7	1.6
OLMS	Inspectors	236	242	126	118	117	114	150	154
	Vehicles	32	35	59	59	46	45	53	51
	I/V	7.3	6.9	2.1	2	2.5	2.5	2.8	3.0

OSHA	Inspectors	1338	1354	1474	1428	1421	1406	1505	1465
	Vehicles	320	308	328	307	310	303	294	306
	I/V	4.2	4.4	4.5	4.7	4.6	4.6	5.1	4.8
WHD	Inspectors	938	933	1308	1328	1350	1321	1308	1326
	Vehicles	38	56	90	93	98	101	102	104
	I/V	24.7	16.7	14.6	14.3	13.8	13.1	12.8	12.8
DOL TOTAL ²	Inspectors	4937	5153	5760	5672	5820	5647	5730	5680
	Vehicles	1708	1814	2172	2169	2203	2146	2069	2029
	I/V	2.89	2.84	2.65	2.62	2.64	2.63	2.77	2.80

¹ The term "inspector" is used generically to describe agency inspectors and investigators.

² DOL's seventh worker protection agency is OWCP which has only one vehicle.

Job Corps vehicles for student transport and other mission-related activities make of the remainder of the DOL fleet. As of 2015, the Department of Labor had not approved Home to Work (HTW) vehicle use for any of its agencies.

All DOL agencies are required to consider car sharing, carpooling, and other options to reduce fleet vehicles. Motor pools are used wherever possible. Vehicles are assigned to individual enforcement inspectors in MSHA and Office of the Inspector General (OIG), but most DOL agencies have five or more people assigned to a single vehicle. DOL fleet management annually reviews the mission needs and agency justification for individual vehicle assignment to determine if increased vehicle sharing is possible.

(F) Evidence of Vehicle Allocation Methodology (VAM) Planning.

Provide information on the methods used to determine your agency's VAM targets/optimal inventory. (Recommendation #2 from GAO report: GAO-13-659. See FMR Bulletin B-30 for guidance on conducting a VAM study and developing VAM targets).

(1) What is the date of your agency's most recent VAM study? Please describe the results (Add/Reduce/Change vehicle types, sizes, etc.). Have all bureaus been studied?

(2) From your most recent VAM study, please describe/provide the specific utilization criteria (miles, hours, vehicle age, or other measures) used to determine whether to retain or dispose of a vehicle? If different criteria were used in different bureaus or program areas, provide the criteria for each.

(3) From your most recent VAM study, what were the questions used to conduct the VAM survey (see FMR Bulletin B-30(6)(C)) (if lengthy, provide as an attachment)? If different questions were used by different bureaus or program areas, provide the questions for each. If a VAM survey was not conducted, please describe the methods used to apply utilization criteria to each vehicle in your agency's fleet and collect subjective information about each vehicle that potentially could provide valuable insights/explanations into the objective criteria.

Methods Used to Produce DOL's VAM Targets

All DOL agencies conduct a detailed review of their vehicles at least twice annually. The VAM is conducted on each vehicle in the DOL fleet and information is used to identify optimization opportunities. Additionally, one-quarter of the DOL fleet is subjected to a detailed review during the GSA acquisition cycle. Because DOL leases the vast majority of its fleet from GSA, one-quarter of DOL's fleet is replaced annually. When determining whether to retain or eliminate vehicles during the GSA acquisition cycle, each DOL agency reviews the vehicles being replaced relative to mission needs. If vehicle utilization is less than 300 miles per month, the agency must consider the vehicle retention costs and whether the vehicle can be eliminated without jeopardizing mission requirements. During the GSA acquisition cycle, agencies are also asked to review their vehicles for size reduction or the potential to convert to an alternative fueled vehicle. As a result of the close scrutiny paid to each vehicle during the GSA vehicle acquisition cycle, DOL reduced fleet leasing costs from FY 2012 to FY 2015 by more than \$5.6 million by eliminating vehicles, reducing vehicle size, and/or changing vehicle fuel types. The VAM information collection provides a basis for anticipatory planning.

VAM Survey Questions

DOL requires all agencies to verify and provide detailed information on each vehicle within the DOL fleet. The fleet criterion collected and analyzed includes:

- Vehicle type, make, model, and model year
- Ownership type (GSA leased or agency owned)
- Acquisition date
- Vehicle fuel type
- Vehicle passenger capacity
- Vehicle garage location (address, city, state, zip)
- Contact name and email for vehicle
- Total number of DOL vehicles (all DOL agencies) garaged at the same location
- Total number of agency vehicles (individual agency) garaged at the same location
- Costs:
 - Lease cost per month
 - Mileage rate cost per month
 - Optional equipment mileage rate
 - Optional equipment monthly rate
- Is primary driver a Federal employee or contractor?
- Average vehicle miles driven per month (utilization)
- Number of months vehicle has been in DOL inventory
- Is the vehicle operated on federal and/or state roadways, or is the vehicle potentially licensable?
- Is the vehicle in operable mechanical condition?
- Does this vehicle typically need to be used off-road, on unpaved or rugged terrain conditions?
- Is the vehicle typically used in extreme climate conditions (snow, icy roads, sleet, etc.)? If yes, provide a description of the conditions.
- Does this vehicle typically need to be used off-road, on unpaved or rugged terrain conditions?
- Is the vehicle typically used in extreme climate conditions (snow, icy roads, sleet, etc.)? If yes, provide a description of the conditions.
- Does this vehicle have specialized installed equipment? If yes, list the equipment.
- Is this vehicle used to transport agency-related cargo? If yes, list the type of agency-related cargo or equipment transported.
- How many people are assigned to use this vehicle?
- In a single vehicle trip, how many people are routinely transported in this vehicle?
- Is this vehicle routinely used for agency official transportation requiring overnight vehicle use?
- Is the vehicle used for law enforcement purposes?
- Does the agency perform under-cover law enforcement work?
- Is the vehicle used for administrative or legislative enforcement?
- Does the agency have any legislatively required response times that require vehicle use? If yes, describe the legislatively required response times that require vehicle use.
- Is vehicle a low greenhouse gas (GHG) model?
- Is vehicle within 5 miles or 15 minutes of a station that sells E-85 (ethanol) fuel?
- Briefly describe how the vehicle is used in the fulfillment of agency mission requirements.
- How critical is the vehicle to the agency's ability to meet its mission?
- If the average vehicle miles (AVM) is less than 300 miles per month, explain why vehicle should be retained.
- Can work be performed using a personally owned vehicle (POV)?
- Can work be performed using short term GSA or other rental vehicles?
- Can work be performed using public transportation?
- Can work be performed using a vehicle motor pool that shares vehicles within the agency?
- Can work be performed using vehicles shared with other DOL agencies?
- Can work be performed using a smaller vehicle size?
- Can work be performed using a gas electric hybrid vehicle?
- Can work be performed using a bio-fueled vehicle (dual-flex E-85/Ethanol or bio-diesel)?
- Can work be performed using another alternative fuel option (CNG, natural gas, all electric)? If yes, list type(s).
- Does agency have other strategies to suggest for optimizing the fleet? If yes, please describe.
- Can vehicle be eliminated without jeopardizing mission requirements?
- Can vehicle size be reduced without jeopardizing mission requirements?
- Can vehicle be changed to low greenhouse gas model (GHG) without jeopardizing mission requirements?
- Can vehicle be changed to an alternative fuel vehicle (AFV) without jeopardizing mission requirements?

- Can vehicle be eliminated from fleet?
- If vehicle is not eliminated, what fuel type will be selected in the future if available through GSA leasing services?
- If vehicle is not eliminated, what vehicle type/size will be selected in the future?
- Additional comments?

(G) Description of the agency-wide Vehicle Management Information System (See FMR 102-34.340)

Federal agencies are to begin collecting asset level data (ALD) beginning October 1, 2016 in order to be able to report ALD in the October-December 2017 FAST data call. To comply, your agency will need a management information system (MIS) capable of reporting inventory, cost, usage, and other information on a "per vehicle" basis.

(1) Does your agency have a vehicle management information system (MIS) at the Department or Agency level that identifies and collects accurate inventory, cost, and use data that cover the complete lifecycle of each motor vehicle (acquisition, operation, maintenance, and disposal), as well as provides the information necessary to satisfy both internal and external reporting requirements?

(2) Your agency was provided a draft list of 70 ALD data elements. How many of the 70 data elements is your current system able to report on a "per vehicle" basis right now?

(3) Describe your agency's plan for reporting all required ALD elements. What is the timeline?

(4) If your agency does not currently have a system capable of reporting ALD, describe the steps (documented) that are being taken or have been taken to comply with Executive Orders, regulations, and laws that require such a system.

The Department of Labor's (DOL) Fleet Management Information System:

The Department of Labor's Fleet Management Information System (FMIS) is AUTOS. Continual upgrades to AUTOS enhance an already robust system that enables the Department to monitor and manage its fleet to leverage cost savings and reduce greenhouse gases, thereby supporting the Department's overall sustainability goals.

AUTOS is key to DOL's ability to achieve a sustainable fleet:

- Alternative Fuel Vehicle operators use AUTOS to locate nearby alternative fuels stations;
- Fleet managers, who are required to input data on vehicle fuel usage and mileage into AUTOS, can then monitor and measure vehicle utilization and costs;
- AUTOS stores up-to-date fleet records that can be routinely analyzed by the fleet manager and used to make strategic optimization decisions;
- Because AUTOS captures vehicle information from acquisition to disposal, historical data can be used to monitor vehicle lifecycles and establish guidelines for maintenance and utilization; and
- Data captured in AUTOS allows DOL to respond to internal and external reporting requirements including GSA's Vehicle Allocation Methodology and Federal Automotive Statistical Tool (FAST) reporting.

Continued use of, and updates to, AUTOS enables the Department to reduce fleet petroleum use, increase alternative fuel use, optimize vehicle utilization to "right-size" the fleet, and increase low emission and high fuel economy acquisitions.

AUTOS already operates on a 'per vehicle' basis and can report on many of the asset level data (ALD) data elements. DOL is currently performing a gap analysis to determine exactly how many of the GSA ALD elements can be reported on, what AUTOS system changes need to be made, and a timetable for doing so. DOL currently anticipates entering ALD data into FAST in October 2016.

(H) Justification for restricted vehicles.

(1) If your agency uses vehicles larger than class III (midsize), is the justification for each one documented?

(2) Does your agency use the law enforcement (LE) vehicle classification system described in GSA Bulletin FMR B-33? If not, why not?

(3) If your agency reports limousines in its inventory, do they comply with the definition in GSA Bulletin FMR B-29?

(4) For armored vehicles, do you use the ballistic resistance classification system of National Institute of Justice (NIJ) Standard 0108.01, and restrict armor to the defined types?

(5) Are armored vehicles authorized by appropriation?

As of 2015, DOL did not exempt its law enforcement agency vehicles from the Energy Policy Act or VAM reporting although the Department has reviewed and considered the law enforcement (LE) vehicle classification system described in GSA Bulletin FMR B-33. DOL anticipates that it will exempt some applicable vehicles in the future.

DOL vehicles larger than class III midsize are justified and documented. Executive fleet vehicles are posted on the DOL website as required by GSA Bulletin FMR B-32 Motor Vehicle Management. As of 2015, DOL did not report any limousines or armored vehicles in inventory.

(I) Impediments to optimal fleet management.

(1) Please describe the obstacles your agency faces in optimizing its fleet.

(2) Please describe the ways in which your agency finds it hard to make the fleet what it should be, operating at maximum efficiency.

(3) If additional resources are needed, (such as to fund management information system implementation or upgrades, or to acquire ZEVs, or LGHG vehicles, or install alternative fuel infrastructure) have they been documented and requested? Do you have a copy of this documentation? (do not attach or furnish unless requested).

(4) Describe what specific laws, Executive Orders, GSA's government-wide regulations or internal agency regulations, budget issues, or organizational obstacles you feel constrain your ability to manage your fleet. Be specific and include examples. If you have a solution, describe it and indicate whether we can share the solution with other agencies as a potential best practice.

- **Agency Mission Needs:** As previously mentioned, the biggest existing hurdle to further fleet optimization is that DOL agencies have special vehicle needs in order to fulfill their missions. ZEVs may not be an option for most DOL agencies. DOL Inspection agencies generally need vehicles that can travel long distances without recharging, sometimes across rugged terrain and in harsh weather conditions. ZEVs may not be able to fulfill these needs. Job Corps needs predominately buses, vans, and trucks to shuttle or train youth enrolled in the Job Corps program. ZEVs cannot substitute for the specialized vehicles needed to meet these specific mission needs.
- **GSA Vehicle Leasing Selection Limitations:** A major impediment to fleet optimization is inherent in what vehicles are available to lease through GSA that can meet mission requirements. For example, in some locations MSHA requires trail-rated vehicles so that mining inspectors can traverse rugged terrain. Currently, GSA does not offer trail-rated vehicles that are also low greenhouse gas (GHG). As another example, Job Corps requires passenger vans for student transportation. In the FY 2016 acquisition cycle, GSA did not offer for lease Standard Industrial Class (SIN) 20 vans that were low GHG.
- **Inaccurate Models for Assessing Fleet Optimization:** In some cases, the VAM model and concurrent optimization goals may be based on inaccurate assumptions about the cost savings and carbon emission reductions generated by fleet reductions. For example, Job Corps requires large buses, mid-sized shuttles, or passenger vans to transport student populations. A cost analysis and vehicle utilization review showed that in many cases the use of multiple passenger vans was more cost-effective and environmentally beneficial than operating large buses that were not always filled to capacity. Therefore, although overall a Job Corps Center's vehicle count may increase as some large buses are replaced with multiple smaller vans, total fleet costs and carbon emissions are expected to decline.
- **Uncertainty Inherent in VAM Projections:** Because the VAM projections are developed without knowing what future vehicles GSA will offer during any particular acquisition cycle or whether an agency may increase or decrease staff in specific regions, the VAM planning may be grossly inaccurate when estimating the mix of alternative fuel and conventional vehicles in the agency's future fleet.
- **Lack of Ethanol (E-85) Infrastructure:** Federal agencies cite the lack of E-85 infrastructure as a hindrance to increased alternative fuel vehicle (AFV) adoption and increased E-85 alternative fuel use. The addition of gas-electric hybrids to the fleet will assist with AFV adoption.
- **Conflicting Statutory Requirements:** The *Energy Independence and Security Act* (EISA) requires that federal agencies acquire only low GHG emitting vehicles. The *Energy Policy Act, 1992/2005* (EPAct) requires agencies to acquire 75 percent of light-duty vehicles (LDVs) as AFVs in Metropolitan Statistical Areas (MSAs). These requirements may conflict when Agencies try to implement them. For example, ethanol-fueled AFV vehicles can increase AFVs and AF in the federal fleet but such vehicles may not be low GHG and may only be eligible for

delivery in certain States. Furthermore, while the addition of gas-electric hybrid vehicles increases AFVs in the federal fleet, these vehicles operate on gasoline. Therefore, increasing the number of gas-electric hybrids negatively impacts the requirement to increase ethanol fuel use. New Executive Order requirements may help to mitigate some of these conflicts.

- **Budgetary Concerns:** DOL's fleet budget is considered when adopting the more expensive gas-electric hybrids and ZEVs because GSA's incremental costs for leasing these vehicles are substantially higher than for a conventionally fueled vehicle. In previous years, GSA assisted DOL and other agencies by funding the incremental costs on gas-electric hybrids, allowing DOL to add more gas-electric hybrids to the Department's fleet than originally intended. This is a program that DOL hopes will continue to be offered by GSA in future years. DOL also commends GSA for recently negotiating with Ford an initial lower cost for electric vehicle orders placed by May 1, 2016.
- **Lack of Resources:** DOL has documented to OMB the need for additional staff and other monetary resources to continue to optimize the Departmental fleet. Additional funding for staff, telematics, and to continue to update and improve upon the DOL AUTOS system is needed, especially if the new addition of telematics data is to become useful and actionable information.
- **GSA's Customer Acquisition Module (CAM) Hinders Optimization Efforts:** The GSA Customer Acquisition Module (CAM) for vehicle acquisitions is cumbersome and in some cases is counterproductive to fleet optimization, because neither the Department's designated final approver for vehicle acquisitions (the Departmental Fleet Manager) nor the mid-level approver (Agency Fleet Manager), has the ability to change in CAM either the vehicle model or the fuel selection if a "local customer" has selected a model or fuel type that violates Departmental policy. CAM's two-tiered approval system means that each vehicle rejected by the Departmental Fleet Manager is required to be sent first to the Agency Fleet Manager who must also reject the vehicle and send it to the local customer for correction. The local customer must then make the requested vehicle changes and send the vehicle back to the Agency Fleet Manager, who must then send it back to the Departmental Fleet Manager for approval. At any step in this cumbersome, time consuming process, the CAM system allows the GSA Field Services Representative (FSR) to bypass the Departmental approval process altogether. The FSR has the ability to remove the vehicle from the Department's approval process and place the vehicle order for whatever model and fuel type the FSR chooses. When an FSR removes a vehicle from the Department's approval process, that vehicle disappears from the Departmental and Agency Fleet Manager "approval areas" of CAM as well as from the Fleet Manager Status reports. Therefore, neither the Departmental Fleet Manager nor the Agency Fleet Manager actually knows that the vehicle has been pulled out of the system and that the vehicle the FSR ordered may not adhere to Departmental policy. Having said that, GSA staff and FSR's should be commended for their work in the FY 2016 acquisition season as vehicles did remain in CAM until the Department's approval cycle was completed. To further improve the process, GSA should consider redesigning CAM to allow the Departmental Fleet Manager to make, at the very least, minor changes such as for fuel type.
- **Preventing Cost Shifting to Employee Personal Owned Vehicles (POV):** DOL Fleet Management intends to track whether reductions in the Departmental fleet result in a substantial increase in agency cost reimbursements for POV usage. If so, potential future fleet reductions will need to be balanced against the increased POV reimbursement costs so as to ensure that mission transportation needs are met at the lowest overall cost.
- **GSA's Blanket Purchase Agreement for Telematics:** It would vastly help DOL's adoption of telematics, and the use of telematics data to continue to optimize the fleet, if GSA acquisition and billing could include the cost of telematics installation and servicing as part of the GSA lease.

(J) Anomalies and possible errors.

- (1) Explain any real or apparent problems with agency data reported in FAST.
- (2) Discuss any data fields highlighted by FAST as possible errors that you chose to override rather than correct. Examples would be extremely high annual operating costs or an abnormal change in inventory that FAST considers outside the normal range, or erroneous data in prior years causing an apparent discrepancy in the current year.
- (3) Explain any unresolved flagged, highlighted, or unusual-appearing data within FAST.

Anomalies with the DOL FAST data were explained and resolved in FAST. Some anomalies were due to changes in how GSA classifies vehicles. For example, some buses were reclassified by GSA as "Heavy Duty" vehicles. As a

result, Heavy Duty vehicles appeared to have high mileage and buses appeared to have low mileage. These classifications were corrected and resolved in FAST.

(K) Summary and contact information.

(1) Who should be contacted with questions about this agency fleet plan? (Provide the name and contact information for the agency headquarters fleet manager and the person preparing this report if different)

Departmental Fleet Manager:
Susan Gilbert-Miller, J.D., Ph.D.
Gilbert.susan.j@dol.gov
202-693-6662

(2) Indicate whether the budget officer participated in the VAM and A-11 processes. (Provide the name and contact information for the budget office reviewing official).

Budget officer who participated in the VAM and A-11 processes:

Budget Analyst
Aleta L. Gibson
gibson.aleta@dol.gov
202-693-4082

(3) Indicate whether the Chief Sustainability Officer participated in the VAM, vehicle planning, and vehicle approval processes. (Provide the name and contact information for the CSO reviewing official).

The Chief Sustainability Officer approves the Fleet Management Plan which includes the VAM results and is kept apprised of the vehicle acquisition approval process.

Chief Sustainability Officer:
Charlotte Hayes
Deputy Assistant Secretary
Hayes.Charlotte@dol.gov
202-693-4059